

1D 0961
6.20.84
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RCRA Closure/Post Closure Inspection

Facility: Arrcom, Inc.
Rathdrum, Idaho 83858
IDD #000800961
Date: July 20, 1984
Inspector: Ron Moczygemba, *Ron Moczygemba*
Environmental Protection Specialist, IOO

On July 20, 1984, I visited Arrcom, Inc. (located 5 miles east of Stateline, Highway 53, Rathdrum, Idaho 83858) to conduct a RCRA closure/post-closure inspection.

During a July 18, 1984 telephone conversation with Mr. Warren Bingham, property owner residing in Pacerville, California, I explained the purpose of the inspection and obtained permission to enter and inspect the site.

FACILITY HISTORY

A June 20, 1982 RCRA inspection conducted by EPA found hazardous waste or hazardous waste constituents had been spilled and/or disposed of on site. EPA Compliant and Compliance Order issued April 27, 1983, required Arrcom, Inc., to submit a Part B RCRA permit application. May 27, 1983, Mr. Warren Bingham submitted a letter to EPA stating the facility would not handle hazardous waste in the future. Mr. Bingham decided not to submit a Part B application. In May 1984, EPA, Region 10 proposed to deny the RCRA permit and terminate Interim Status at the facility. Comment period for the proposed action ended July 2, 1984.

FACILITY INSPECTION

Facility was not operating at time of inspection and there was no indication that any activity had taken place at the site since vacated by the EPA Emergency Response clean up crew in September 1983. No site representative was present during the inspection and no post-closure plan was available. Storage tanks and other structures on site were photographed (Attachment #1).

Entrance to the site remains closed by cable and padlock (photos #1, 2, & 3).

The RCRA inspection checklist is attached.

Attachments



RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 198⁴)

A. Inspection: Type of Inspection: Evaluation (); Sampling ();
Record Review (); Special (); Follow-up;
Date/Time Inspection commenced: July 20, 84 ; 1000 HRS

B. Facility

EPA/State ID 0000800961
Name & Addresses AARCOM, INC
1. Mailing:
2. Location: 5 MILES EAST OF STATELINE, HIGHWAY 53
RATHDRUM, IDAHO 83858

Contact: MR. WARREN BINGHAM, 4760 MT. ACUM RD., PLACERVILLE, CA 95667
Telephone: (916) 644-3343

<u>Compliance Summary</u>	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	()	()
40 CFR 270	()	()	()
40 CFR 124	()	()	()
40 CFR 261.5	()	()	()
40 CFR 262	()	()	()
40 CFR 263	()	()	()
40 CFR 264 (Permit)	()	()	()
40 CFR 265	()	()	()

Specific Violations: _____

D. Inspector

Name (Print) RON MOCZYGENBA Title: ENV. PROT. SPECIALIST
Signature Ron Moczygenba
Organization US EPA - IDAHO OPS OFFICE
Phone FTS 554-1450 ; 208-334-1450

E. Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Phone #</u>

F. Notification/Permit Information

- Started operation: _____ Date: ?
- Notification filed: YES NO Date: _____
- Part A application filed: YES NO Date: 11-17-80
- Part B called/Date Due YES NO Date: NOV 83
- Part B application: YES NO Date: _____
- Changes in Notification or Part A: _____ ?

7. Facility's classified as:

- Generator ()
- Transporter ()
- Treatment facility ()
- Storage facility ()
- Disposal facility (X)
- Small quantity generator ()
- Recycler ()
- Less than 90 day storage ()
- Wastewater treatment unit exemption (WWTU) ()
- Elementary neutralization unit exemption (ENU) ()

8. Does facility have a Part A withdrawal request in ?
YES NO

Status _____

Comments: EPA REGION 10 HAS PROPOSED RCRA PERMIT DENIAL AND TERMINATION OF INTERIM STATUS AT AARCOM, INC COMMENT PERIOD ENDED JULY 2, 1984

Subpart E - Manifest System, Recordkeeping, and Reporting 40
CFR 265.70

1. Manifest System

- a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:
- (1) Sign and date each copy of manifest receipt of certifying waste? YES NO
 - (2) Note any discrepancies on each copy? YES NO
 - (3) Give delivering transporter one signed and dated copy of the manifest? YES NO
 - (4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO
 - (5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO
- b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? YES NO
- c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: YES NO
- (1) Bulk waste-quantity variation of 10 percent or greater
 - (2) Batch waste - any variation in piece count
 - (3) Waste type - obvious differences discernible by inspection or waste analysis
- d. If significant discrepancies are found, does the TSD facility:
- (1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO

e. TSD facilities must keep a written operating record documenting the following details:

- (1) Waste description and quantity received
- (2) Methods and dates of its treatment, storage, and disposal
- (3) The location and quantity of each HW at the facility

Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES NO

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES NO

(2) The location of each Hazardous Waste within the facility, and its quantity? YES NO

(3) A map showing disposal sites? YES NO

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? Yes NO

(5) Records and results of inspections as required (need only be kept three years)? YES NO

(6) All closure and post-closure cost estimates required for the facility? YES NO

(7) The results of testing and waste analysis? YES NO

3. Facility Reporting Procedures

- a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES NO
- b. Is owner/operator familiar with procedures for emergencies? YES NO
- c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO

Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)
 - a. Description of how and when the facility will be partially closed (if applicable) and finally closed?
YES NO
 - b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?
YES NO
 - c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO
 - d. Comment:

No closure plan AVAILABLE AT FACILITY

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)
 - a. Description of how post closure will be carried out for the next 30 years. () ()
 - b. Notice to the local land authority within 90 days after closure is completed? () ()
 - c. Notice in deed to property? () ()

No Post-Closure Plan AVAILABLE AT FACILITY

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability *N/A*

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million? YES NO
- (2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?
- (a) HW facility liability endorsement(s) ()
 - (b) HW facility certificate(s) of liability insurance ()
 - (c) financial test ()
 - (d) corporate guarantee ()
 - (e) multiple mechanisms (specify) ()
- b. (1) If a surface impoundment, landfill, or land treatment exist at the facility, does facility maintain liability insurance for nonsudden occurrence in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million? YES NO
- (2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?
- (a) HW facility liability endorsement(s)' ()
 - (b) HW facility certificate(s) of liability insurance' ()
 - (c) financial test ()
 - (d) corporate guarantee ()
 - (e) multiple mehcanisms (specify) ()

- c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?
- d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.151?
YES NO

Comment:

2. Assurance *ANSWERS BASED ON FINDINGS DURING INSPECTION*

a. Closure

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO

(2) Has this cost estimate been adjusted annually for inflation? YES NO

(3) Has facility established financial assurance for the closure of the facility (40CFR 265.143)? YES NO

(4) By what method has this been achieved:

- a. Trust fund ()
- b. Surety bond (with standby trust) ()
- c. Letter of credit (with standby trust) ()
- d. Insurance ()
- e. Financial test ()
- f. Corporate guarantee ()
- g. Multiple mechanisms ()

(5) Has facility submitted an originally signed duplicate of financial assurance to RA? YES NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151. YES NO

(7) Comment:

b. Post-Closure (Disposal Facilities)

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Has this cost estimate been adjusted annually for inflation? YES NO

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)?

YES NO

(4) By what method has this been achieved:

- (a) Trust fund ()
- (b) Surety bond (with standby trust) ()
- (c) Letter of credit (with standby trust) ()
- (d) Insurance ()
- (e) Financial test ()
- (f) Corporate guarantee ()
- (g) Multiple Mechanisms ()

(5) Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator?

YES NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151?

YES NO